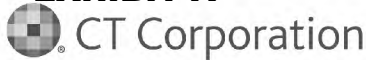


**EXHIBIT A**



**Service of Process  
Transmittal**

10/17/2019

CT Log Number 536457811

**TO:** KIM LUNDY SERVICE OF PROCESS  
WALMART INC.  
702 SW 8TH ST, MAILSTOP 0215  
BENTONVILLE, AR 72716-6299

**RE: Process Served in Virginia**

**FOR:** Wal-Mart Stores East, LP (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Bi Jie, Pltf. vs. Wal-Mart, Inc. and Wal-Mart Stores East, LP, Dfts.

**DOCUMENT(S) SERVED:** Summons, Complaint, Cover Sheet

**COURT/AGENCY:** Fairfax County Circuit Court, VA  
Case # CL20190013803

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition - 10/30/2017 -  
Located at 1500 B Comerside Blvd., Vienna, Virginia

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Glen Allen, VA

**DATE AND HOUR OF SERVICE:** By Process Server on 10/17/2019 at 15:10

**JURISDICTION SERVED :** Virginia

**APPEARANCE OR ANSWER DUE:** Within 21 days after service

**ATTORNEY(S) / SENDER(S):** James R. Tate  
Tate Bywater PLC  
2740 Chain Bridge Road  
Vienna, VA 22181  
703-938-5100

**ACTION ITEMS:** CT has retained the current log, Retain Date: 10/18/2019, Expected Purge Date:  
10/23/2019  
  
Image SOP  
  
Email Notification, KIM LUNDY SERVICE OF PROCESS ctlawsuits@walmartlegal.com

**SIGNED:** C T Corporation System  
**ADDRESS:** 1999 Bryan St Ste 900  
Dallas, TX 75201-3140

**For Questions:** 877-564-7529  
MajorAccountTeam2@wolterskluwer.com

**SPS**

**COMMONWEALTH OF VIRGINIA  
CIRCUIT COURT OF FAIRFAX COUNTY  
4110 CHAIN BRIDGE ROAD  
FAIRFAX, VIRGINIA 22030  
703-691-7320  
(Press 3, Press 1)**

**Jie Bi vs. WalMart Inc et al.**

**CL-2019-0013803**

**TO: WalMart Stores East LP  
Serve: CT Corporation System  
4701 Cox Road, Suite 285  
Glen Allen VA 23060**

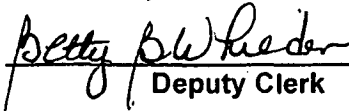
**SUMMONS – CIVIL ACTION**

**The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the Clerk's office of this Court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment or decree against such party either by default or after hearing evidence.**

**APPEARANCE IN PERSON IS NOT REQUIRED BY THIS SUMMONS.**

**Done in the name of the Commonwealth of Virginia, on October 15, 2019.**

**JOHN T. FREY, CLERK**

By:   
**Deputy Clerk**

**Plaintiff's Attorney: James R Tate**

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED  
CIVIL INTAKE  
2019 OCT -8 AM 9:45  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

**JIE BI**  
7314 Churchill Road  
McLean, Virginia 22101

Plaintiff,

v.

Case No.: **2019 13803**

**Wal-Mart, Inc.**  
**Wal-Mart Stores East, LP**  
702 S.W. 8<sup>th</sup> Street  
Bentonville, Arkansas 72716  
Serve:  
C T Corporation System  
4701 Cox Rd, Ste 285  
Glen Allen, VA 23060

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**COMPLAINT**

COMES NOW the Plaintiff, Jie Bi, who complains and alleges as follows:

1. Plaintiff is a resident of Virginia, residing at 7314 Churchill Road, McLean, Virginia 22101.
2. Defendant, Wal-Mart, Inc. and Wal-Mart Stores East, LP, is a Delaware limited partnership, having its principal office at 702 S.W. 8<sup>th</sup> Street, Bentonville, Arkansas 72716, and a registered agent in Virginia.
3. The amount in controversy satisfies this Court's jurisdictional requirements.
4. Venue is proper in this Court. The action arose within Fairfax County, Virginia.

5. On October 30, 2017 at approximately 1:30 p.m. Plaintiff was shopping at Defendant's Store #5936, located at 1500 B Cornerside Blvd., Vienna, Virginia. Plaintiff was looking to purchase candy and bleach and asked a Wal-Mart Associate for assistance in finding the items that he was seeking. The Wal-Mart Associate assisting Plaintiff led him to another area of the store where Plaintiff fell and was seriously injured. As Plaintiff was following the Wal-Mart Associate, she led him past an empty shopping cart next to a loose metal shelf that was sticking out into the walk space. A part of Plaintiff's clothing, a shoelace or his jeans, became caught in a corner of the shelf and Plaintiff fell. A Wal-Mart Store Manager came over to the area where Plaintiff fell and, before Plaintiff had recovered sufficiently to take photographs of the area where he fell, the Store Manager closed the gap on the shelf that caused Plaintiff to fall.

6. Defendant knew or should have known about the hazardous condition on their property. Specifically, Defendant knew or should have seen that the shelf, as left at the time Plaintiff's clothing became entangled, was a hazard to Defendant's invitees such as Plaintiff.

7. Defendant's Associate who was guiding Plaintiff did not take any steps to warn or remediate the danger to Plaintiff, such as removing the shopping cart obstructing Plaintiff's view and closing the gap on the shelf that caught Plaintiff's clothing causing him to fall.

8. Plaintiff was an invitee to Defendant's premises and, as such, Defendant owed him a duty to exercise due care to protect and warn Plaintiff about conditions that can result in injury.

9. Defendant's failure to remove or warn of this hazardous condition was negligent and was the proximate cause of Plaintiff's injuries.

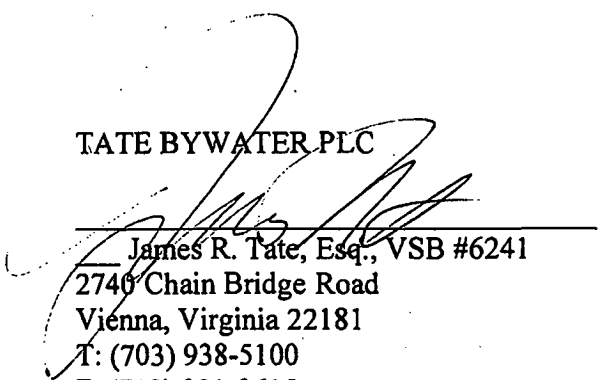
10. The personal injuries suffered by Plaintiff include bodily injuries, physical pain, suffering, inconvenience, mental anguish, humiliation and embarrassment, as well as medical bills.

WHEREFORE, your Plaintiff prays for judgment, jointly and severally, against Defendant, for all injuries caused by Defendants' negligence in the amount of One Hundred Fifty Thousand Dollars (\$150,000.00), and for costs in this matter, and such other and further relief as the Court may deem proper.

PLAINTIFF DEMANDS A TRIAL BY JURY.

Jie Bi  
By Counsel

TATE BYWATER PLC



James R. Tate, Esq., VSB #6241  
2740 Chain Bridge Road  
Vienna, Virginia 22181  
T: (703) 938-5100  
F: (703) 991-0605  
E: jtate@tatebywater.com  
Counsel for Plaintiff

**EXHIBIT A****FAIRFAX CIRCUIT COURT  
CIVIL CASE COVERSHEET****2019 13803****Parties:**

Plaintiffs	Defendants
1. Jie Bi	1. Wal-Mart, Inc.
2.	2. Wal-Mart Stores East, LP
3.	3.

**\*Plaintiff proceeding without Counsel – Address and Daytime Phone Number required on Complaint****Plaintiff Attorney:**

Name: <b>James R. Tate</b>	Bar ID: <b>6241</b>
Firm: <b>TATE BYWATER</b>	
Street: <b>2740 Chain Bridge Road</b>	
City: <b>Vienna</b>	State: <b>VA</b> Zip: <b>22181</b>
Phone Number: <b>703-938-5100</b>	Fax Number: <b>703-991-0605</b>
E-mail Address: <b>jtate@tatebywater.com</b>	

FILED  
CIVIL INTAKE  
2019 OCT -8 AM 9:45  
JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX VA

**Nature of Complaint (Check only one)****\* Cases in the Civil Tracking Program**

<input type="checkbox"/> Administrative Appeal	<input type="checkbox"/> Defamation *	<input type="checkbox"/> Malpractice – Medical *
<input type="checkbox"/> Affirmation of Marriage	<input type="checkbox"/> Delinquent Taxes *	<input type="checkbox"/> Mechanics/Vendors Lien *
<input type="checkbox"/> Aid & Guidance	<input type="checkbox"/> Eminent Domain	<input type="checkbox"/> Partition *
<input type="checkbox"/> Appeal Decision of Board of Zoning	<input type="checkbox"/> Encumber/Sell Real Estate	<input type="checkbox"/> Personal Injury – Assault *
<input type="checkbox"/> Appeal of Process/Judicial Appeal	<input type="checkbox"/> Erroneous Assessments	<input type="checkbox"/> Personal Injury – Auto *
<input type="checkbox"/> Appointment Church/Organization Trustees	<input type="checkbox"/> Expungement	<input type="checkbox"/> Personal Injury – Emotional *
<input type="checkbox"/> Arbitration	<input type="checkbox"/> False Arrest/Imprisonment*	<input checked="" type="checkbox"/> Personal Injury – Premises Liability*
<input type="checkbox"/> Attachment	<input type="checkbox"/> Fiduciary/Estate Complaint	<input type="checkbox"/> Property Damage*
<input type="checkbox"/> Complaint – Equity *	<input type="checkbox"/> Garnishment–Federal–180 days	<input type="checkbox"/> Products Liability*
<input type="checkbox"/> Complaint – Legal Cause of Action *	<input type="checkbox"/> Garnishment–Wage–180 days	<input type="checkbox"/> Quiet Title *
<input type="checkbox"/> Compromise Settlement	<input type="checkbox"/> Garnishment–Other – 90 days	<input type="checkbox"/> Real Estate *
<input type="checkbox"/> Condemnation*	<input type="checkbox"/> Guardian/Conservator Adult	<input type="checkbox"/> Restoration of Driving Privilege
<input type="checkbox"/> Confession of Judgment	<input type="checkbox"/> Guardianship/Minor	<input type="checkbox"/> Vital Record Correction
<input type="checkbox"/> Construction *	<input type="checkbox"/> Injunction	<input type="checkbox"/> Writ Habeas Corpus
<input type="checkbox"/> Contract *	<input type="checkbox"/> Interpleader	<input type="checkbox"/> Writ Mandamus
<input type="checkbox"/> Conversion*	<input type="checkbox"/> Insurance *	<input type="checkbox"/> Wrongful Death*
<input type="checkbox"/> Court Satisfaction of Judgment	<input type="checkbox"/> Judicial Review	<input type="checkbox"/> Wrongful Discharge *
<input type="checkbox"/> Declare Death	<input type="checkbox"/> Malicious Prosecution *	<input type="checkbox"/> OTHER:
<input type="checkbox"/> Declaratory Judgment *	<input type="checkbox"/> Malpractice – Legal *	

**Damages in the amount of \$ 150,000.00 are claimed.**

**Requested Service:** Sheriff ☐ Private Process Server ☐ DMV ☐ Secretary of Commonwealth ☐  
 State Corporation Commission ☐ Publication ☐ No Service at this time ☐